

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                            |   |                                |
|----------------------------|---|--------------------------------|
| <b>In re:</b>              | : |                                |
|                            | : | <b>Case No.: 23-02305</b>      |
| <b>Elizabeth Caymares,</b> | : | <b>Chapter 13</b>              |
|                            | : | <b>Judge Mark J. Conway</b>    |
| <b>Debtor.</b>             | : | <b>*****</b>                   |
|                            | : |                                |
|                            | : |                                |
|                            | : | <b>Related Document No. 10</b> |

**OBJECTION OF GUILD MORTGAGE COMPANY LLC TO  
THE CONFIRMATION OF THE PLAN (DOCKET NUMBER 10)**

Guild Mortgage Company LLC ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed plan ("Plan") filed by Elizabeth Caymares ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 137 Dad Burnhams Rd, Pine Grove, PA 17963 ("Property").
2. Creditor intends to file a Proof of Claim which includes an approximate pre-petition arrearage in the amount of \$993.33.
3. Debtor's Plan does not provide for the arrearage due on Creditor's claim.
4. Debtor's Plan represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the

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Debtor's currently proposed Plan.

Respectfully submitted,

/s/Alyk L. Oflazian

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Attorneys for Creditor

The case attorney for this file is Alyk L. Oflazian.

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**Debtor.** : **\*\*\*\*\***  
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**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Objection of Guild Mortgage Company LLC to the Confirmation of the Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Jack N Zaharopoulos, Chapter 13 Trustee, info@pamd13trustee.com

MICHAEL A. CIBIK, Attorney for Elizabeth Caymares, mail@cibiklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Elizabeth Caymares, 137 Dad Burnhams Rd, Pine Grove, PA 17963-8388

/s/Alyk L. Oflazian

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